



## ***image inks***

2284 Speers Road, Oakville, Ontario L6L 2X8  
Phone: 905 / 825-5600 Fax: 905 / 825-8833  
[info@imageinks.ca](mailto:info@imageinks.ca) [www.imageinks.ca](http://www.imageinks.ca)

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This is in response to your request for regulatory information applicable to our UVACURE HS 23 Series UV Cup Inks.

The US Food and Drug Administration (FDA) does not approve inks, but rather packaging material that holds or stores food such as plastics, paper and paperboard. The ink components would be considered components of the container make-up and are regulated in that manner. UVACURE HS 23 Series UV curable inks do not have an FDA status, but are acceptable for use on food packaging, provided there is a functional barrier to the migration of the ink components. We can state that the inks comply with appropriate FDA / Code of Federal Regulations Safety Requirements entitled incidental food contact ( 21 CFR 174.5, 16 CFR 1303, Section 4.3.5.4, ASTM F 963, Section 4.3.5, ASTM F 963 and sections 175-178, 176.170, 182.90, Title 21 CFR)

The Restriction of Hazardous Substances Directive limits the quantities of lead, hexavalent chromium, cadmium, mercury, polybrominated biphenyls, and polybrominated diphenyl ethers for certain applications. The CONEG regulations specifically impact lead, hexavalent chromium, cadmium and mercury.

I would like to confirm that the heavy metals cadmium, arsenic, mercury, antimony, hexavalent chromium, polybrominated biphenyls, polybrominated diphenyl ethers, lead and selenium or compounds based on these metals are not used in manufacturing UVACURE HS 23 Series UV curable inks . It is expected that the trace contaminant levels of these substances are well below the RoHS permissible limit of 10 ppm for cadmium and 100 ppm for the others and below the CONEG regulations limit of 100 ppm. Subsequent handling, mixing or other use of our products should follow good manufacturing practices to maintain these levels.

Further, UVACURE HS 23 Series UV curable inks will comply with the Toy Manufacturers Heavy Metal specification ASTM 963. Those chemicals listed by California Proposition 65, are not intentionally added to the inks. Also, all materials contained in these UV inks are listed on the Toxic Substances Control Act (TSCA) inventory. They are also listed on either the Canadian Domestic Substances List (DSL), Non-domestic Substance List (NDSL), or on the Transitional list to the DSL.

We have also tested the average Volatile Organic Compound (VOC) content of the UVACURE HS 23 Series inks, and we can report an average processing VOC of 0.97%.

The statements made here are according to our present knowledge.

They do not absolve the user from his/her own responsibility to ascertain that our product is suitable for their process. No legal implication should be derived from our statements as explicit guarantees with respect to product performance which are neither expressed nor implied. Currently existing laws and regulations should be observed by the consignees of our products at their own risk.

Sincerely,

Anthony T. Kurz  
President  
Image Group